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Attorneys for Party-In-Interest, South San Joaquin Irrigation District

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In Re:

PG&E CORPORATION

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

Bankruptcy Case No. 19 - 30088 (DM)

Chapter 11

(Lead Case)

(Jointly Administered)

**SOUTH SAN JOAQUIN IRRIGATION
DISTRICT'S IDENTIFICATION OF
EXHIBITS IN SUPPORT OF (A)
OBJECTION TO DEBTORS' AND
SHAREHOLDER PROPONENTS' JOINT
CHAPTER 11 PLAN OF
REORGANIZATION DATED MARCH 16,
2020 AS AMENDED (DOCKET NO. 6320)
AND (B) OBJECTION TO CURE AMOUNTS
AND OTHER MATTERS PERTAINING TO
ASSUMPTION PURSUANT TO SECTION
365(B)(1) OF THE BANKRUPTCY CODE
(DOCKET NO. 7037)**

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric
Company
☒ Affects both Debtors

**All papers shall be filed in the Lead Case,
No. 19-30088 (DM).*

Judge: Hon. Dennis Montali

Date: May 27, 2020

Time: 10:00 a.m.

Place: United States Bankruptcy Court
450 Golden Gate Ave., 16th Flr, Crt. 17
San Francisco, CA 94102

Objection

Deadline: May 25, 2020 at 4:00 p.m. (PT)

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2 **TO THE HONORABLE DENNIS MONTALI, UNITED STATES BANKRUPTCY**
3 **JUDGE, AND ALL PARTIES IN INTEREST:**

4 South San Joaquin Irrigation District (the “District”) is an objecting party that intends to
5 participate at the hearing on confirmation of *Debtors’ and Shareholder Proponents’ Joint*
6 *Chapter 11 Plan of Reorganization Dated March 16, 2020 as Amended (Docket No. 6320)* (the
7 “Plan”). The District filed the *South San Joaquin Irrigation District’s (A) Objection to Debtors’*
8 *and Shareholder Proponents’ Joint Chapter 11 Plan of Reorganization Dated March 16, 2020 as*
9 *Amended (Docket No. 6320) and (B) Objection to Cure Amounts and Other Matters Pertaining*
10 *to Assumption Pursuant to Section 365(b)(1) of the Bankruptcy Code (Docket No. 7037)* [Docket
11 No. 7265] (the “Objection”) and hereby designates the following exhibits for the hearing on
12 confirmation of the Plan and the Objection:

- 13 A. Declaration of Mia S. Brown in support of the Objection (Docket No. 7364),
14 which was filed on May 15, 2020;
- 15 B. All of the exhibits, which are identified in the Request for Judicial Notice (Docket
16 No. 7274) (“ORJN”), which the District filed in support of the Objection, including:
- 17 1. The District’s Amended Proof of Claim (Claim No. 98548), a true and correct
18 copy of which is attached to the ORJN as Exhibit A;
- 19 2. Declaration of Peter Rietkerk (Docket No. 6081), which was filed in support of
20 the District’s motion for relief from stay District’s motion for relief from stay
21 (Docket No. 6078) (“MRAS”);¹ a true and correct copy of that declaration is
22 attached to the ORJN as Exhibit B;
- 23 3. Declaration of Peggy O’Laughlin (Docket No. 6082), which was filed in support
24 of the MRAS; a true and correct copy of that declaration is attached to the ORJN
25 as Exhibit C;

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27 ¹ The MRAS was resolved and the stay was lifted by the Bankruptcy Court’s *Order Approving*
28 *Stipulation Between Debtors and South San Joaquin Irrigation District for Relief from the*
Automatic Stay (Docket No. 6390) (“Lift Stay Order”), which approved a stipulation between the
District and PG&E to lift the stay (Docket No. 6783).

4. Request for Judicial Notice (“RJN”), which was filed in support of the MRAS; a true and correct copy of the RJN is attached to the ORJN as Exhibit D;
5. First Amended Complaint to Determine Validity and for Declaratory Relief; and Verified Petition for Writ of Mandate in *PG&E v. San Joaquin Local Agency Formation Commission* (February 25, 2015) (without exhibits), a true and correct copy of which is attached to the RJN as Exhibit 1 to the RJN;
6. Order on PG&E’s Motion for Summary Adjudication No. 1 (March 7, 2016), a true and correct copy of which is attached to the RJN as Exhibit 2 to the RJN;
7. Order on PG&E’s Motion for Summary Adjudication No. 2 (March 7, 2016), a true and correct copy of which is attached to the RJN as Exhibit 3 to the RJN;
8. Judgment After Court Trial in LAFCo Action (October 31, 2017), a true and correct copy of which is attached to the RJN as Exhibit 4 to the RJN;
9. Third District Court of Appeal – Docket for Case No. C086008, a true and correct copy of which is attached to the RJN as Exhibit 5 to the RJN;
10. Complaint in Eminent Domain (July 7, 2016), a true and correct copy of which is attached to the RJN as Exhibit 6 to the RJN;
11. Judgment in Eminent Domain Action (January 16, 2018), a true and correct copy of which is attached to the RJN as Exhibit 7 to the RJN;
12. Third District Court of Appeal – Docket for Case No. C086319, a true and correct copy of which is attached to the RJN as Exhibit 8 to the RJN;
13. The District’s Resolution of Necessity No. 16-05-E (without exhibits), a true and correct copy of which is attached to the RJN as Exhibit 9 to the RJN;
14. Excerpts of the District’s Staff Report Resolution of Necessity Hearing for SSJID’s Retail Electric Project - - Property Acquisition (Excerpts), a true and correct copy of which is attached to the RJN as Exhibit 10 to the RJN;
- C. Appendix of Plan Excerpts filed in Support of the Objection (Docket No. 7267), which was filed on May 15, 2020.

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DATED: May 18, 2020

STRADLING YOCCA CARLSON & RAUTH
A PROFESSIONAL CORPORATION

By: /s/ Paul R. Glassman
Paul R. Glassman
Attorneys for Party-in-Interest,
South San Joaquin Irrigation District